

Exhibit A

From: Randa Osman
To: [Schwartz, Jenny](#)
Cc: [Lenning, Cassandra](#); [Ryan Swindall](#); [Alicia Cobb](#); [Onyendu, Kendall](#); [Subit, Michael](#)
Subject: [EXTERNAL] RE: Smith v. Coupang, Inc., 2:23-cv-01887-RAJ
Date: Monday, March 25, 2024 11:51:44 AM
Attachments: [image001.png](#)

Hi Jenny,

Yes, the extension applies to the RFJN as well as the Motion to Dismiss.

As to a new complaint, we do not have authority to consent to the filing of an amended or "corrected" complaint. If you want to send us a redline with the proposed changes, we can discuss it again with our client. But, as of now, we do not have authority.

Best regards,

Randa

From: Schwartz, Jenny <jschwartz@outtengolden.com>
Sent: Monday, March 25, 2024 11:31 AM
To: Randa Osman <randaosman@quinnemanuel.com>
Cc: Lenning, Cassandra <clenning@outtengolden.com>; Ryan Swindall <ryanswindall@quinnemanuel.com>; Alicia Cobb <aliciacobb@quinnemanuel.com>; Onyendu, Kendall <konyendu@outtengolden.com>; Subit, Michael <msubit@frankfreed.com>
Subject: RE: Smith v. Coupang, Inc., 2:23-cv-01887-RAJ

[EXTERNAL EMAIL from jschwartz@outtengolden.com]

Thanks, Randa. Happy to give the same extension to Defendant to file Reply. And I just want to confirm that the agreement would include an extension on the RFJN (opposition is technically due today)?

As to a the complaint, to be clear, we seek only to file corrections of typographical errors in two or three places, where we inadvertently referred to Coupang LLC as Coupang Global LLC. I doubt the Court would deny us this right to correct an error. Given this clarification, would you consent?



Jenny Schwartz | Partner

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From: Randa Osman <randaosman@quinnemanuel.com>
Sent: Monday, March 25, 2024 11:24 AM
To: Schwartz, Jenny <jschwartz@outtengolden.com>
Cc: Lenning, Cassandra <clenning@outtengolden.com>; Ryan Swindall <ryanswindall@quinnemanuel.com>; Alicia Cobb <aliciacobb@quinnemanuel.com>; Onyendu, Kendall <konyendu@outtengolden.com>; Subit, Michael <msubit@frankfreed.com>
Subject: [EXTERNAL] RE: Smith v. Coupang, Inc., 2:23-cv-01887-RAJ

Hi Jenny,

Coupang is amenable to a one-week extension of time to file Smith's opposition to the Motion to Dismiss the Amended Complaint, provided that Smith agrees to give Coupang the same extension of time to file its Reply brief.

Coupang does not consent to the filing of a second amended complaint. Coupang has already filed two motions to dismiss and is not inclined to agree to expend even more time and resources on another round of pleadings and eventual motion to dismiss.

Best regards,

Randa

From: Schwartz, Jenny <jschwartz@outtengolden.com>
Sent: Sunday, March 24, 2024 6:41 PM
To: Randa Osman <randaosman@quinnemanuel.com>
Cc: Lenning, Cassandra <clenning@outtengolden.com>; Ryan Swindall <ryanswindall@quinnemanuel.com>; Alicia Cobb <aliciacobb@quinnemanuel.com>; Onyendu, Kendall <konyendu@outtengolden.com>; Subit, Michael <msubit@frankfreed.com>
Subject: RE: Smith v. Coupang, Inc., 2:23-cv-01887-RAJ

[EXTERNAL EMAIL from jschwartz@outtengolden.com]

Randa –

We'd greatly appreciate a response to these requests regarding the filing of a corrected AC and a week's additional time on the oppo to the MTD/RFJN in exchange for additional time on the Reply.



Jenny Schwartz | Partner

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From: Randa Osman <randaosman@quinnemanuel.com>
Sent: Friday, March 22, 2024 3:56 PM
To: Schwartz, Jenny <jschwartz@outtengolden.com>
Cc: Lenning, Cassandra <clenning@outtengolden.com>; Ryan Swindall <ryanswindall@quinnemanuel.com>; Alicia Cobb <aliciacobb@quinnemanuel.com>; Onyendu, Kendall <konyendu@outtengolden.com>; Subit, Michael <msubit@frankfreed.com>
Subject: [EXTERNAL] RE: Smith v. Coupang, Inc., 2:23-cv-01887-RAJ

Hi Jenny,

I am sorry for not getting back to you earlier, but I have been in witness interviews all afternoon. I also sorry to hear that you and another member of your team are not feeling well.

We will discuss your requests with our client and will get back to you.

I hope you feel better soon.

Best,

Randa

From: Schwartz, Jenny <jschwartz@outtengolden.com>
Sent: Friday, March 22, 2024 12:17 PM
To: Randa Osman <randaosman@quinnemanuel.com>
Cc: Lenning, Cassandra <clenning@outtengolden.com>; Ryan Swindall <ryanswindall@quinnemanuel.com>; Alicia Cobb <aliciacobb@quinnemanuel.com>; Onyendu, Kendall <konyendu@outtengolden.com>; Subit, Michael <msubit@frankfreed.com>
Subject: RE: Smith v. Coupang, Inc., 2:23-cv-01887-RAJ

[EXTERNAL EMAIL from jschwartz@outtengolden.com]

Hi Randa –

One other thing –

We'd also ask if you're willing to stipulate/consent to us filing a Corrected Amended Complaint without seeking leave of the Court. We inadvertently incorrectly identified Coupang Global as Mr. Smith's employer in a couple of instances where it should have said Coupang LLC and we don't want to cause any confusion with the Court and would like to correct the record. Apologies for the confusion this may have caused you.

I'm not sure we actually need your consent to file a "corrected complaint" as opposed to and Amended Complaint but out of an abundance of caution, want to make sure we have taken steps to

get your consent. Will you agree?

Thanks.



Jenny Schwartz | Partner

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From: Schwartz, Jenny <jschwartz@outtengolden.com>

Sent: Friday, March 22, 2024 10:55 AM

To: Randa Osman <randaosman@quinnemanuel.com>

Cc: Lenning, Cassandra <clenning@outtengolden.com>; Ryan Swindall <ryanswindall@quinnemanuel.com>; Alicia Cobb <aliciacobb@quinnemanuel.com>; Onyendu, Kendall <konyendu@outtengolden.com>; Subit, Michael <msubit@frankfreed.com>

Subject: RE: Smith v. Coupang, Inc., 2:23-cv-01887-RAJ

Hi Randa,

Hope you've had a good week.

I'm writing to see if you'll consent to our request for a week's extension of time on the Opposition (Making to due April 8). Unfortunately, Cassandra was hit with COVID at the beginning of last week. She's feeling better but still trying to get back to her full self. And at the same time, I've been hit with something that isn't COVID whatever it is its keeping me from sleeping so I'm running on 2-3 hours a sleep a night. Of course my Dr.'s appt isn't until April 2. My entire team is juggling a bunch of other matters next week, making full focus on the opposition very challenging.

My expectation is that Judge Jones would be sympathetic to these issues but we prefer to go to him with an unopposed request. Of course we'd stip to additional time on your Reply (which would otherwise typically be effectively four days under the local rules).

One other thing: I want to be more specific in my response to your walk-away offer – I think you were suggesting a walk away the eliminated Mr. Smith's risks of fees. Can you let me know your thoughts about what fees he's exposed to beyond those that could be awarded if the court found that his complaint was frivolous? I want to make sure I'm not missing something.

Thank you in advance for your courtesy and quick reply so we can plan ahead.

Best,

Jenny



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